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VIA ECFS

October 25, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Application of Qwest Corporation d/b/a CenturyLink QC Pursuant to 47 C.F.R.
§ 63.63 for the Emergency Impairment of Service; WC Docket No. 19-69

Dear Ms. Dortch:

On September 18, 2018, Qwest Corporation d/b/a CenturyLink QC (“CenturyLink”) filed the above-referenced application for the emergency impairment of service in limited portions of the Florence, Colorado wire center primarily as a result of damage sustained from flooding in mid-July 2018 (“Application”).¹ The prolonged service impairment in this area has not been resolved. CenturyLink has made filings to extend authority for this emergency impairment, and, by this letter, seeks a further extension of authority for an additional 60 days. As described in the Application and subsequently-filed extensions, which are incorporated herein by reference, substantial challenges in this area remain. CenturyLink is targeting state broadband grant funds to help support the rebuilding effort necessary to restore service. Accordingly, pursuant to Section 63.63(b) of the Commission’s Rules, 47 C.F.R. § 63.63(b), CenturyLink respectfully requests an additional 60-day extension of the authority for the emergency impairment of service in limited portions of the Florence wire center.

As stated in the Application, CenturyLink is still unable to state what effect this impairment may have on rates in the area as it continues to evaluate options to restore service. As stated in previous submissions, CenturyLink supplied impacted customers with satellite phones for their use free-of-charge and has transitioned to providing these customers a subsidy to obtain service on a long-term basis from HughesNet or ViaSat.² CenturyLink will continue to

¹ Prior to the establishment of a docket number for this matter, CenturyLink’s Application and filings to extend authority were submitted via the “Submit a Non-Docketed Filing” module of the Commission’s Electronic Comment Filing System pursuant to Sections 63.63(a), (b), 47 C.F.R. §§ 63.63(a), (b).

² It is CenturyLink’s intent not to charge affected customers for services during the outage period.

work with affected customers to help ensure a seamless transition to this new temporary service option. No additional customers have availed themselves of this service alternative since CenturyLink's last submission. To date, approximately 10 customers have made use of this substitute service.

As stated in its Application and the extensions previously filed, CenturyLink described how the timing of service restoration would likely depend on the reconstruction of critical infrastructure in the area, namely County Road 386. The area is still expected to be unstable for a prolonged period of time.³ Now with winter weather approaching, this preferred option for restoral continues to be on a lengthy timeline, at best, and questions remain as to whether it is viable at all. Unfortunately, temporary cable continues not to be a feasible solution to provide service due to the rugged, mountainous terrain and instability in the area.

CenturyLink held a meeting with Custer County on September 18, 2019 and continues its work with affected residents, the Custer County Commissioners, Senator Cory Gardner's office, the Colorado Department of Transportation, and the United States Forest Service to explore alternatives. CenturyLink expects to continue to hold stakeholder meetings on a periodic basis to keep all stakeholders informed and engaged in the efforts to restore service.

Given the challenges described above, CenturyLink continues to analyze other options to restore service. CenturyLink is targeting use of state broadband grant funds to help defray the cost of rebuilding while also potentially enabling provision of broadband to this area and other neighboring underserved areas. At this time, CenturyLink is preparing to apply for a state broadband funding opportunity through the State of Colorado Broadband Deployment Board that opens in January 2020. Additionally, CenturyLink continues to explore other funding opportunities through the United States Department of Agriculture, but those options still appear to have a lengthy timeline. In the meantime, CenturyLink will continue to coordinate with affected stakeholders and will report additional information regarding service restoral within approximately the next 60 days as part of the emergency impairment filing process under Section 63.63.

³ See Exhibit A to November 19, 2018 filing which is a summary of challenges related to rebuilding in the area prepared by the United States Forest Service.

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For the foregoing reasons, in light of the devastating flooding and continued construction challenges in the area, CenturyLink respectfully requests that the Commission approve a further 60-day extension of authority for the emergency impairment of service in limited portions of the Florence wire center.

Respectfully submitted,

**QWEST CORPORATION D/B/A
CENTURYLINK QC**

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